

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 17-mc-00151-LPS

NORTHROP GRUMMAN SHIP SYSTEMS, INC.,

Plaintiff,

v.

THE MINISTRY OF DEFENSE OF THE REPUBLIC OF
VENEZUELA,

Defendant.

C.A. No. 20-mc-257-LPS

KOCH MINERALS SÀRL, KOCH NITROGEN
INTERNATIONAL SÀRL,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 22-mc-156-LPS

SAINT-GOBAIN PERFORMANCE PLASTICS
EUROPE,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA

Defendant

C.A. No, 23-mc-00397-LPS

**MOTION AND PROPOSED ORDER GRANTING LIMITED EXEMPTION FROM THE
STANDING ORDER REGARDING PERSONAL ELECTRONIC DEVICES**

Plaintiffs and judgment creditors Northrop Grumman Ship Systems, Inc., f/k/a Ingalls Shipbuilding, Inc., and now known as Huntington Ingalls Incorporated (“Huntington Ingalls”); Koch Minerals Sàrl (“KOMSA”) and Koch Nitrogen International Sàrl (“KNI”) (collectively, “the Koch Parties”); and Saint-Gobain Performance Plastics Europe (collectively, “Four Judgment Creditors”) move for an order to exempt certain persons from the District of Delaware’s May 15, 2023 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 15, 2023 Standing Order”). In support of the Motion, the Four Judgment Creditors state as follows:

1. The District of Delaware’s May 15, 2023 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, *inter alia*, visitors to place personal electronic devices in a locked pouch provided by U.S. Marshals. Paragraph 4 of the May 15, 2023 Standing Order provides for certain exemptions to the Standing Order.
2. A status conference and motion hearing are scheduled for February 27, 2024.

3. Alex Yanos and Apoorva Patel are counsel for the Four Judgment Creditors. Mr. Yanos has been admitted *pro hac vice* in the parties' respective actions and intends to appear at the February 27, 2024 status conference and motion hearing. Mr. Patel has a pending request to be admitted *pro hac vice* in the parties' respective actions and intends to appear at the February 27, 2024 status conference and motion hearing.
4. Mr. Yanos and Mr. Patel do not meet the exemptions listed in Paragraph 4 of the May 15, 2023 Standing Order. While both Mr. Yanos and Mr. Patel are in good standing with at least one State bar in the United States, they do not possess a physical, hard-copy Bar ID card.
5. The Four Judgment Creditors respectfully request an exemption for Counsel from the Standing Order identical to attorneys that possess a valid bar identification card. Counsel will continue to be bound by Local Civil Rule 83.2 prohibiting photographs or broadcasting.

DATED: February 23, 2024

OF COUNSEL:

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Respectfully submitted:

/s/ Peter J. Keane

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Attorneys for Plaintiffs

IT IS SO ORDERED this _____ day of _____, 2024.

The Honorable Leonard P. Stark